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LONG ISLAND OFFICE

Magistrate Judge Steven I. Locke
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: Hernandez et al v. Rosso Uptown, Ltd et al case 2:20-cv-04026-JMA-SIL

Hostility of Plaintiff's lawyer to release information about the cases mentioned and used as reference in his pre trial order.

Dear Judge Locke,

I am writing to bring to your attention certain difficulties I have encountered in my communications with the plaintiffs' counsel, Mr. Moser, regarding the clarification of the summary of facts necessary to establish the elements of the case.

In the process of preparing for our case, I reached out to Mr. Moser seeking detailed clarification on specific elements of the summary of facts referenced in his legal arguments. However, Mr. Moser has responded in a manner that I find uncooperative and obstructive.

Specifically, Mr. Moser has limited his response to merely citing cases number and legal references without providing the requested detailed information (summary of the cases) or context necessary for me to fully understand and address the issue at hand.

When I expressed my need for a more comprehensive explanation Mr. Moser stated in email exchanges (**see Emails attached, Exhibit A my emails to Mr. Moser, Exhibit B his response, Exhibit C a sample of his Pre trial order without any summary of the cases cited but only referring to flsa overtime**) that it was my responsibility to research the references and the cases he referred to.

This approach not only impedes my ability to prepare my case adequately but also seems contrary to the spirit of cooperative and fair legal proceedings. As I am diligently trying to ensure a thorough fair preparation, I respectfully request the Court's assistance in this matter. Can the court encourage or mandate more detailed and cooperative communication from the plaintiff's counsel to facilitate a fair trial process?

Thank you for your time and consideration. I look forward to your guidance on this matter.

Sincerely, Michael Tizzano

